Case 2:23-cv-01071-RSM Document 16 Filed 04/02/24 Page 1 of 4 1 THE HONORABLE RICARDO S. MARTINEZ 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 VANTHA DOUN, NO. 2:23-cv-01071 RSM 9 10 Plaintiff, STIPULATION AND ORDER REGARDING EXPERT WITNESS VS. 11 DISCLOSURE DEADLINE VALMET INC., a foreign profit 12 corporation, 13 Defendant. 14 15 16 The parties through their counsel of record hereby stipulate as follows. They believe 17 good cause exists to extend the expert disclosure deadlines for the following reasons: 18 1. Discovery closes June 10, 2024 (ECF No. 11). 19 2. The current deadline to disclose expert witnesses is April 10, 2024 (ECF No. 11). 20 3. Plaintiff's deposition was set for March 26, 2024. However, due to Defense 21 counsel's unforeseen illness, Plaintiff's deposition had to be rescheduled. 22 4. The first mutually available rescheduled date for Plaintiff's deposition is April 23 18, 2024. 24 5. Both parties further intend to disclose the testimony of at least one expert witness. 25 6. In order to provide expert witnesses sufficient time to review Plaintiff's testimony

STIPULATION AND ORDER REGARDING EXPERT WITNESS DISCLOSURE DEADLINE (2:23-01071 RSM) – Page 1

FISHER & PHILLIPS LLP 1700 SEVENTH AVENUE, SUITE 2200 SEATTLE, WA 98101-4416 Phone: (206) 682-2308 Fax: (206) 682-7908

prior to preparing expert reports as required under FRCP 26(a)(2), the parties

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1		agree that the existing expert disco	overy deadline order should be extended to May
2		3, 2024. This will provide any	expert witnesses sufficient time to review
3		Plaintiff's testimony and prepare	any report(s) based partially thereon.
4	7.	The parties further agree that reb	outtal expert witnesses under FRCP 26, if any,
5		must be disclosed by May 20, 2	2024, to provide sufficient time to engage in
6		relevant discovery.	
7	8.	In order to facilitate adequate time	e for relevant discovery regarding such rebuttal
8		experts, if any, the parties agree	e that any rebuttal expert depositions may be
9		scheduled through June 24, 2024-	—two weeks after the discovery cutoff. This is
10		the sole extension of the discover	y deadline.
11			
12	IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.		
13	DATED:	April 1, 2024	DATED: <u>April 1, 2024</u>
14	FISHER	& PHILLIPS LLP	BRESKIN, JOHNSON & TOWNSEND, PLLC
15	/s Cathai	rine M. Morisset	/s Brendan W. Donckers
16		e M. Morisset, WSBA #29682 Petitta, WSBA #58295	Daniel F. Johnson, WSBA #27848 Brendan W. Donckers, WSBA #39406
17	1700 7 th	Ave., Suite 2200	1000 Second Ave., Suite 3760
18	-	WA 98101 206) 682-2308	Seattle, WA 98104 Phone: (206) 652-8660
19		t@fisherphillips.com	djohnson@bjtlegal.com bdonckers@bjtlegal.com
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ORDER

Based on the foregoing Stipulation, the following deadlines are SO ORDERED:

Deadline	Date
Disclosure of Expert Testimony	May 3, 2024
Disclosure of Rebuttal Expert Testimony	May 20, 2024
Discovery Cutoff	June 10, 2024
Rebuttal Expert Depositions Completed	June 24, 2024

DATED this 2^{nd} day of April, 2024.

RICARDO S. MARTINEZ

UNITED STATES DISTRICT JUDGE

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FP 50151462.5

1	CERTIFICATE OF SERVICE		
2	The undersigned hereby certifies that on the date written below, I caused a true and correct		
3	copy of the foregoing document to be served on the following attorney, via the method		
4	indicated:		
5	Daniel F. Johnson, WSBA #27848 Via CM/ECF		
6	Brendan W. Donckers, WSBA #39406 BRESKIN JOHNSON & TOWNSEND, PLLC		
7	1000 Second Avenue, Suite 3670 Seattle, WA 98104		
8	Phone: (206) 652-8660		
9	Email: djohnson@bjtlegal.com Email: bdonckers@bjtlegal.com		
10	aiarossi@bjtlegal.com admin@bjtlegal.com		
11	Attorneys for Plaintiff		
12	Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 1, 2024 in accordance with 28 USC 1746.		
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16	Jazmine Matautia, Legal Secretary		
17	Jazinine Matautia, Legal Secretary		
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FISHER & PHILLIPS LLP 1700 SEVENTH AVENUE, SUITE 2200 SEATTLE, WA 98101-4416 Phone: (206) 682-2308 Fax: (206) 682-7908